

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE VALVE ANTITRUST LITIGATION

CASE NO.: 2:21-cv-00872-JCC

**DECLARATION OF STEPHANIE L.
JENSEN IN SUPPORT OF DARK CATT
PLAINTIFFS' LCR 37 SUBMISSION
REGARDING REQUEST FOR
PRODUCTION NO. 79**

REDACTED VERSION

1 I, Stephanie L. Jensen, submit this declaration in support of Dark Catt's Local Civil Rule
2 37 Submission Regarding Request for Production No. 79.

3 1. I am a member of Wilson Sonsini Goodrich & Rosati P.C. ("WSGR") and am
4 counsel for Plaintiffs Dark Catt Studios Holdings, Inc. and Dark Catt Studios Interactive LLC
5 (collectively, "Dark Catt") in the above-captioned litigation. I have personal knowledge of the
6 facts set forth in this declaration except as noted herein and could and would competently testify
7 to them if called as a witness.

8 2. Attached hereto as **Exhibit 1** is a true and correct excerpt of Plaintiffs' Third Set of
9 Requests for the Production of Documents on Defendant Valve Corporation dated June 9, 2023.

10 3. Attached hereto as **Exhibit 2** is a true and correct excerpt of Valve Corporation's
11 Responses and Objections to Plaintiffs' Third Set of Requests for Production of Documents dated
12 July 10, 2023.

13 4. Attached hereto as **Exhibit 3** is a true and correct copy of G. Skok's August 11,
14 2023, letter to N. Siebert describing the [REDACTED]
15 produced under Bates number VALVE_ANT_2755012. The [REDACTED] was produced "on the
16 condition that Plaintiffs do not upload it to, or store it on, more than one server at a single location,
17 accessible only to those persons authorized under the Protective Order § 4.3 . . ."

18 5. Attached hereto as **Exhibit 4** is a true and correct copy of a March 4, 2022 email to
19 T. Giardino and K. Aitchison Boyle regarding Steam YIR internal messaging and bearing Bates
20 number VALVE_ANT_0788570.

21 6. Attached hereto as **Exhibit 5** is a true and correct copy of N. Buchter's September
22 7, 2023 letter to J. Steiner and A. Tanenbaum responding to Dark Catt's letters regarding Plaintiffs'
23 Third Set of Discovery Requests.

24 7. Attached hereto as **Exhibit 6** is a true and correct copy of a January 20, 2021
25 message re "[REDACTED]," bearing Bates number VALVE_ANT_2568730.

26 8. Attached hereto as **Exhibit 7** is a true and correct copy of Valve Counsel G. Skok's
27 June 2, 2023 letter to Plaintiffs' Counsel N. Siebert.

1 9. Attached hereto as **Exhibit 8** is a true and correct copy of G. Skok's June 30, 2023
2 email to N. Siebert.

3 10. Attached hereto as **Exhibit 9** is a true and correct copy of G. Skok's July 12, 2023
4 email to N. Siebert.

5 11. Attached hereto as **Exhibit 10** is a true and correct copy of N. Siebert's September
6 13, 2023 letter to N. Buchter regarding Plaintiffs' Fourth Set of Requests for Production, Fourth
7 Set of Interrogatories, and the parties' meet and confer on August 25.

8 12. Attached hereto as **Exhibit 11** is a true and correct excerpt of Valve Corporation's
9 Responses and Objections to Plaintiffs' Second Set of Requests for Production of Documents dated
10 September 20, 2022.

11 13. Attached hereto as **Exhibit 12** is a true and correct copy of G. Skok's October 6,
12 2023 letter to N. Siebert responding to the September 13, 2023 letter, above.

13 14. Attached hereto as **Exhibit 13** are true and correct excerpts from the October 5,
14 2023 deposition transcript of K. Gerber. [Gerber Dep. 33:19-34:4; 35:8-11; 36:24-37:9]

15 15. Attached hereto as **Exhibit 14** are true and correct excerpts from the October 13,
16 2023 30(b)(6) deposition transcript of S. Lynch. [Lynch Dep. 59:24-60:5; 86:15-17; 87:9-15;
17 88:21-89:5; 93:4-99:3]

18 16. Attached hereto as **Exhibit 15** is a true and correct excerpt from Valve's handbook
19 for new employees. The handbook is available at [https://steamcdn-](https://steamcdn-a.akamaihd.net/apps/valve/Valve_NewEmployeeHandbook.pdf)
20 [a.akamaihd.net/apps/valve/Valve_NewEmployeeHandbook.pdf](https://steamcdn-a.akamaihd.net/apps/valve/Valve_NewEmployeeHandbook.pdf).

21 17. Attached hereto as **Exhibit 16** is a true and correct copy of a document titled "Valve
22 Corporation Presentation to the Board of Directors, December 5, 2013." Valve produced this
23 document in this litigation as VALVE_ANT_1064234. The slip page (included in front of the
24 document) bears that Bates number and states that the document was produced natively. When
25 the native version is loaded, Exhibit 16 is the result.

26 18. Attached hereto as **Exhibit 17** is a true and correct excerpts of Plaintiffs' Second
27 Set of Requests for the Production of Documents on Defendant Valve Corporation.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed this 30th day of October, 2023, at Carnation, Washington.

3
4 /s/ Stephanie L. Jensen

Stephanie L. Jensen